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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NICHOLAS COLAIZZI,

Plaintiff,

v.

**BANK OF AMERICA, N.A., and
EQUIFAX INFORMATION
SERVICES, LLC.,**
Defendant.

Case No.: 2:14-cv-02053-GMN-NJK

**STIPULATION AND
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO
DISMISS**

[SECOND REQUEST]

Plaintiff, NICHOLAS COLAIZZI (“Plaintiff”), and Defendant, BANK OF AMERICA, N.A. (“Defendant”), hereby submit the following Stipulation to Extend Time for Plaintiff to Respond to Defendant’s Motion to Dismiss. The current deadline is set for September 10, 2015.

1. Defendant filed its Motion to Dismiss Plaintiff’s First Amended Complaint [Dkt. No. 23] on August 10, 2015.
2. Plaintiff and Defendant have agreed to an extension of time of 14 days, up to and including September 24, 2015 for Plaintiff to respond to Defendant’s Motion To Dismiss.
3. This request is not made for purposes of delay, but rather to allow the parties to explore settlement. Discussions have already begun, and the extension will allow the parties to possibly avoid additional costs and time of further briefing in the event resolution can be reached.

The parties therefore respectfully request this Court enter an order granting an extension of time of 14 days, up to and including September 24, 2015, for Plaintiff to respond to Defendant’s Motion to Dismiss.

DATED: September 3, 2015

AKERMAN LLP


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IT IS SO ORDERED:

Plaintiff shall have 14 days, up to and including September 24, 2015, to respond to Defendant's Motion to Dismiss.



Gloria M. Navarro, Chief Judge
United States District Court

DATED: September 4, 2015

SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant, and that I have obtained their authorization to affix their electronic signature to this document.

Dated: September 3, 2015

KAZEROUNI LAW GROUP

By: /s/ Danny Horen
DANNY HOREN, ESQ.
ATTORNEY FOR PLAINTIFF